

Accessibility Policy

HUMAN RESOURCES



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Effective
December 15, 2020

OVERALL PRINCIPLES

OMERS is committed to ensuring that our services and workplaces are accessible to people with disabilities, in compliance with relevant legislation in the jurisdictions in which OMERS and Oxford operate.

If you have a disability and require accommodation or adjustments, let us know, and we will make every reasonable effort to support you.

This Policy is available to the public and to employees on internal and external websites, and in other formats upon request.

This Policy applies to all Employees and Contractors across OMERS and Oxford.

Next renewal date:	December 2022
Frequency of review:	Every 2 years

Support for Persons with Disabilities

We strive to provide services in a way that respects the dignity and independence of people with disabilities. If you need accommodation for a disability, let us know, and we will provide accessibility and accommodation in ways that take into account your disability and accessibility needs.

If you visit our premises or contact us for any reason, we will make all reasonable attempts to accommodate your needs. For example:

- accommodations for assistive devices that help you perform everyday tasks;
- service animals are welcome on our premises that are open to the public and to the extent permitted by law;
- support persons are welcome on our premises; or
- we can provide accessible formats and communication supports, such as large-font, recorded audio, or teletypewriter (TTY) through a telecom provider.

We consider the needs of people with disabilities when we design or acquire self-service kiosks, and when we design or modify our buildings and public spaces.

We will ensure that our websites comply with international standards for making web content more accessible for people with disabilities.

If there will be any disruptions to our services or facilities, we will post notices appropriately at impacted locations, including on our websites and telephone lines.

Applying for a Job

Our online job application notifies applicants that we will accommodate people with disabilities throughout the recruitment and selection process. If you are contacted about an employment opportunity, let us know if you require accommodation, and we will consult with you to meet your needs.

Support for Employees with Disabilities

If you are an OMERS or Oxford employee and you have a disability, or you become disabled either permanently or temporarily during your employment with us, contact the People Experience team via Workday if you require accommodation. We will consult with you to develop an Individual Accommodation Plan suited to meet your needs. In some cases, we may need to request an evaluation by an outside medical practitioner or other expert, in order to determine appropriate accommodation.

An Individual Accommodation Plan will include an outline of the accommodation or adjustments needed, including any accessible formats and communications required to enable you to perform your job and to make workplace information accessible. If you need support during an emergency, such as a building evacuation, let a People Experience advisor know and we will develop an Individualized Emergency Response Plan to ensure you stay safe.

Your Individual Accommodation Plan, and any information that you choose to provide about your disability, will be kept confidential. Information will only be shared, with your consent, with individuals who may need to provide assistance, such as your Manager.

Your Individual Accommodation Plan will be reviewed with you regularly and updated if your needs change, and if you are transferred to another location or a different job. We will also consider your needs throughout our performance management process and career development programs such as learning programs, networking groups, and mentoring.

Returning to Work After an Absence

If you have been absent from work because of a disability, and you require accommodation or adjustments in order to return to work, contact your HRBP and we will develop an arrangement to support you.

Training for Employees

We provide employees with training to ensure that our services and workplaces are accessible to people with disabilities, in compliance with relevant legislation in the jurisdictions in which OMERS and Oxford operate.

For example, in Ontario, we comply with Accessibility Standards for Customer Service regulations under the *Accessibility for Ontarians with Disabilities Act, 2005 (AODA)*. Ontario employees who deal with the public on our behalf are properly trained on how to communicate with people with various types of disabilities. They receive training within 30 days of hire which includes:

- the purposes of the AODA and the Human Rights Code as it pertains to persons with disabilities;
- how to interact and communicate with people with various types of disabilities;
- how to interact with people with disabilities who use an assistive device or require the assistance of a service animal or a support person;
- what to do if a person with a disability is having difficulty in accessing our services;
- our policies, practices and procedures relating to accessibility; and
- training on the equipment and devices that are available on our premises.

Training may also be provided that exceeds local standards, when it is in keeping with OMERS values and commitment to ensure accessible workplaces and services.

Feedback

We will ensure that processes for receiving and responding to feedback are available to persons with disabilities. We will arrange accessible formats and communication supports upon request, in a timely manner, and at a cost equal to the regular cost charged to others, if any.

Feedback on this Policy and on our provision of services to people with disabilities may be provided to:

Celine Chiovitti, SVP, Pension & Corporate Services
(416) 369-2383
Toll free 1-800-387-0813 ext. 2383
cchiovitti@omers.com

Nancy Nazer
Chief Human Resource Officer
(416) 369-2493
nnazer@omers.com

Responding to Incidents of Non-Compliance

The Policy Manager is accountable for identifying incidents of potential non-compliance under this Policy based on established procedures and reporting such incidents to the Policy Sponsor.

Exceptions

Exceptions to this Policy must be approved by the Policy Sponsor. The Policy Manager will maintain a written record of exceptions.

Monitoring and Reporting

This Policy and our Multi-Year Plan are reviewed regularly, to ensure we continue to meet our commitments and comply with all relevant legislation.

The Policy Monitor is responsible for implementing procedures for monitoring compliance with this Policy, responding to feedback on the Policy or our services to people with disabilities and responding to incidents of non-compliance.

Documents related to this Policy

In compliance with the AODA, we have a Multi-Year Accessibility Plan included as Appendix A in this Policy, which outlines how we will meet accessibility requirements in Ontario.

ROLES & RESPONSIBILITIES

Policy Approver and Sponsor	Chief Human Resources Officer	Ultimately accountable for the Policy, including its development, implementation, administration and approval
Policy Manager and Monitor	Vice President, People Experience	Responsible for the design and operational effectiveness of the day to day administration of the Policy and for the monitoring, compliance and reporting functions of the Policy

APPENDIX A MULTI-YEAR ACCESSIBILITY PLAN

This plan outlines the measures OMERS has taken and will take to identify, remove and prevent barriers to people with disabilities, in compliance with the AODA regulations.

1. Training

OMERS will continue to provide training to staff on Ontario's accessibility laws, in accordance with the Accessibility Standards for Customer Service regulations under the AODA, and on the Human Rights Code as it relates to people with disabilities. Training is provided in a way that best suits the duties of staff members. We have taken the following steps to ensure staff received the training needed to meet Ontario's accessible laws:

- Training about accessibility and the requirements set out under this Policy have been incorporated into our annual Compliance training; and
- New Individuals are required to complete the Compliance training within 30 days of their hire date.

2. Kiosks

We have considered the needs of people with disabilities when designing, procuring or acquiring self-service kiosks. We have considered technical and structural features of kiosks, as well as accessible paths to the kiosks.

3. Information and Communications

OMERS is committed to meeting the communication needs of people with disabilities.

OMERS has taken the following steps to ensure existing feedback processes are accessible to people with disabilities in Ontario upon request:

- We administer our feedback processes in accessible formats and make communication supports available upon request.

OMERS has taken the following steps to make sure all publicly available information in Ontario is made accessible upon request:

- We provide information and communications in accessible formats and with communication supports to people with disabilities upon request; and
- Where people with disabilities request information and communications in accessible formats, including communications supports, this is provided

in a timely manner and at a cost equal to the regular cost charged to others, if any.

OMERS has taken the following steps to make all websites and content conform with WCAG 2.0, Level AA by **June 30, 2021**:

- We have ensured that all websites and web content, including web-based applications, that we control directly or indirectly through a contractual relationship that allows for modification of the product, meet the WCAG 2.0 Level AA standard.

4. Employment

OMERS is committed to fair and accessible employment practices. We take the following steps to notify the public and staff that, when requested, we accommodate people with disabilities during the recruitment and assessment processes and when people are hired:

- All recruitment is managed through the online Applicant Tracking System. We include a statement in the Applicant Tracking System, including job postings and employment letters, to inform all applicants and employees that persons with disabilities will be accommodated throughout the recruitment and selection process and for the duration of employment with OMERS; and
- Successful candidates are notified verbally of our policies for accommodating employees with disabilities when the offer of employment is made.

OMERS has taken the following steps to develop and put in place a process for developing individual accommodation plans and return-to-work policies for employees in Ontario that have been absent due to a disability:

- HR has developed a standard template for the development of individual accommodation plans and return-to-work programs.

We have taken the following steps to ensure the accessibility needs of employees with disabilities are taken into account in performance management, career development and redeployment processes:

- Employees with disabilities have an individual accommodation plan developed by HR in consultation with the employee and manager. The plans include consideration for performance management, career development and redeployment processes.

5. Design of Public Spaces

We meet the Accessibility Standards for the Design of Public Space when building or making major modifications to public spaces in Ontario. Public spaces include:

- recreational trails/beach access routes;
- outdoor public eating areas like rest stops or picnic areas;
- outdoor play spaces, like playgrounds in provincial parks and local communities;
- outdoor paths of travel, like sidewalks, ramps, stairs, curb ramps, rest areas and accessible pedestrian signals;
- accessible off-street parking; and
- service-related elements like service counters, fixed queuing lines and waiting areas.

Oxford has put procedures in place to prevent service disruptions to its accessible parts of its public spaces.

In the event of a service disruption to the accessible parts of public spaces, we notify the public of the service disruption and alternatives available.

The OMERS Multi-Year Accessibility Plan will be reviewed and updated every 5 years.

For more information on this accessibility plan, please contact Carol Alfieri, Vice President, People Experience, Human Resources

- Phone: (416) 369-3707
- Email: calfieri@Omers.com

Accessible formats of this document are available free upon request from Maria Valentim

- Phone (416) 369-2450
- Email: mvalentim@omers.com

APPENDIX B ACCESSIBILITY LEGISLATION

The following links provide information on applicable accessibility legislations in each jurisdiction:

Australia

- [Disability Discrimination Act 1992](#)

Canada

- Ontario: [Accessibility for Ontarians with Disability Act, 2005](#)

Germany

- [Employment Equality Directive – Directive 2000/78/EC](#)
- [General Equal Treatment Act 2006](#)

Luxembourg

- [Employment Equality Directive – Directive 2000/78/EC](#)

Netherlands

- [Employment Equality Directive – Directive 2000/78/EC](#)

United States

- [Americans with Disabilities Act of 1990](#)

United Kingdom

- [Equality Act 2010](#)